

DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
ELISE GOULD, RONALD GOULD, SHAYNA :
GOULD, JESSICA RINE, HENNA NOVACK :
WALDMAN, MORRIS WALDMAN, SHMUEL :
WALDMAN, :
:
Plaintiffs, :
:
v. :
:
THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE PALESTINIAN :
AUTHORITY (PA), :
:
-----Defendants-----:
X

Jury Verdict Form
04 Civ. 00397 (GBD)

LIABILITY

I. JANUARY 22, 2002 – JAFFA ROAD SHOOTING

1. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **January 22, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out this ~~terrorist~~ attack?

YES NO

2. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 22, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out this ~~terrorist~~ attack?

YES NO

3. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 22, 2002 terrorist** attack because an employee of **Defendant PA**, acting within the scope of his employment and in furtherance of the interests of **Defendant PA**, either committed the ~~terrorist~~ attack (*i.e., was the shooter*) or knowingly provided material support or resources that were used in preparation for or in carrying out this ~~terrorist~~ attack?

YES NO

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DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
ELANA SOKOLOW, JAMIE SOKOLOW, :
LAUREN SOKOLOW, MARK SOKOLOW, :
RENA SOKOLOW, :
:
Plaintiffs, :
:
v. :
:
THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE :
PALESTINIAN AUTHORITY (PA), :
:
-----Defendants-----X

Jury Verdict Form

04 Civ. 00397 (GBD)

LIABILITY

II. JANUARY 27, 2002 – JAFFA ROAD BOMBING

1. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **January 27, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out this **e-terrorist** attack?

YES

NO

2. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 27, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out this **terrorist** attack?

YES

NO

3. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 27, 2002 terrorist** attack because an employee of **Defendant PA**, acting within the scope of his employment and in furtherance of the interests of **Defendant PA**, either committed the terrorist attack or knowingly provided material support or resources that were used in preparation for or in carrying out the terrorist attack?

YES

NO

DRAFT as of 2/12/15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

	x
: ALAN BAUER, BINYAMIN	
BAUER, DANIEL : BAUER,	
YEHONATHON BAUER, YEHUDA :	
BAUER,	:

Plaintiffs,

V.

THE PALESTINE LIBERATION
ORGANIZATION (PLO) and THE
PALESTINIAN AUTHORITY (PA),

Defendants

X

Jury Verdict Form

04 Civ. 00397 (GBD)

LIABILITY

III. MARCH 21, 2002 – KING GEORGE STREET BOMBING

1. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **March 21, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out ~~the~~this ~~terrorist~~ attack?

YES

NO

2. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **March 21, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out this e ~~terrorist~~ attack?

YES

NO

3. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **March 21, 2002 terrorist**-attack because an employee of **Defendant PA**, acting within the scope of his employment and in furtherance of the interests of **Defendant PA**, either committed the **terrorist**-attack (*i.e., was the bomber*) or knowingly provided material support or resources that were used in preparation for or in carrying out **the this terrorist**-attack?

YES

NO

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DRAFT as of 2/12/15

4. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **June 19, 2002** ~~terrorist~~ attack because it knowingly provided to the al-Aqsa Martyrs' Brigade, after its designation as a Foreign Terrorist Organization, material support or resources that were used in preparation for or in carrying out ~~the~~ this terrorist attack?

~~YES~~

~~NO~~

YES

NO

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DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT

~~SOUTHERN DISTRICT OF NEW YORK~~ - - -

x

KATHERINE BAKER, ESTATE OF BENJAMIN
BLUTSTEIN, REBEKAH BLUTSTEIN, RICHARD
BLUTSTEIN, ESTATE OF DIANE CARTER,
LARRY CARTER, SHAUN CHOFFEL, ROBERT
L. COULTER JR., DIANE COULTER MILLER,
ROBERT L. COULTER SR., ESTATE OF
JANIS RUTH COULTER, ESTATE OF DAVID
GRITZ, NEVENKA GRITZ (on behalf of herself
and as successor to NORMAN GRITZ),

Plaintiffs,

v.

THE PALESTINE LIBERATION
ORGANIZATION (PLO) and THE PALESTINIAN
AUTHORITY (PA),

----- Defendants. -----

x

Jury Verdict Form

04 Civ. 00397 (GBD)

LIABILITY

V. JULY 31, 2002 – HEBREW UNIVERSITY BOMBING

1. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **July 31, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out ~~the~~ this ~~terrorist~~ attack?

YES

NO

2. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **July 31, 2002 terrorist** attack because it knowingly provided material support or resources that were used in preparation for or in carrying out ~~this~~ terrorist attack?

YES

NO

DRAFT as of 2/12/15

3. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **July 31, 2002 terrorist**-attack because an employee of **Defendant PA**, acting within the scope of his employment and in furtherance of the interests of **Defendant PA**, ~~either committed the terrorist attack or~~ knowingly provided material support or resources that were used in preparation for or in carrying out ~~the this terrorist~~-attack?

YES NO

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4. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **July 31, 2002 terrorist**-attack because it knowingly provided to Hamas, after its designation as a Foreign Terrorist Organization, material support or resources that were used in preparation for or in carrying out ~~this terrorist~~-attack?

YES NO

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5. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **July 31, 2002 terrorist**-attack because it knowingly provided to Hamas, after its designation as a Foreign Terrorist Organization, material support or resources that were used in preparation for or in carrying out ~~this he terrorist~~-attack?

YES NO

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6. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **July 31, 2002 terrorist**-attack because it harbored or concealed a person who it knew, or had reasonable grounds to believe, committed or was about to commit ~~the is terrorist~~-attack?

YES NO

7. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **July 31, 2002 terrorist**-attack because it harbored or concealed a person who it knew, or had reasonable grounds to believe, committed or was about to commit ~~the is terrorist~~-attack?

YES NO

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7.

~~YES~~

~~NO~~

DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
CHANA GOLDBERG, ELIEZER GOLDBERG, :
ESTHER GOLDBERG, KAREN GOLDBERG, :
SHOSHANA GOLDBERG, TZVI GOLDBERG, :
YAAKOV GOLDBERG, YITZHAK GOLDBERG, :
:
Plaintiffs, :
v. :
:
THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE PALESTINIAN :
AUTHORITY (PA), :
:
-----Defendants-----X

Jury Verdict Form

04 Civ. 00397 (GBD)

LIABILITY

VI. JANUARY 29, 2004 – BUS NO. 19 BOMBING

1. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **January 29, 2004 terrorist**-attack because it knowingly provided material support or resources that were used in preparation for or in carrying out the **terrorist**-attack?

YES NO

2. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 29, 2004 terrorist**-attack because it knowingly provided material support or resources that were used in preparation for or in carrying out ~~the~~this **terrorist**-attack?

YES NO

3. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 29, 2004 terrorist**-attack because an employee of **Defendant PA**, acting within the scope of his employment and in furtherance of the interests of **Defendant PA**, either committed the **terrorist**-attack (i.e., was the bomber) or knowingly provided material support or resources that were used in preparation for or in carrying out the ~~e-ist~~**terrorist**-attack?

YES NO

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4. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PLO** is liable for the **January 29, 2004** ~~terrorist~~ attack because it knowingly provided to the al-Aqsa Martyrs' Brigade, after its designation as a Foreign **Terrorist** Organization, material support or resources that were used in preparation for or in carrying out the ~~is terrorist~~ attack?

YES NO

5. Did Plaintiffs prove by a preponderance of the evidence that **Defendant PA** is liable for the **January 29, 2004** ~~terrorist~~ attack because it knowingly provided to the al-Aqsa Martyrs' Brigade, after its designation as a Foreign **Terrorist** Organization, material support or resources that were used in preparation for or in carrying out the ~~is terrorist~~ attack?

YES NO

5.

YES NO

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DRAFT as of 2/12/15

IF YOU FIND THAT AT LEAST ONE DEFENDANT IS LIABLE AS TO ANY PLAINTIFF,
PLEASE PROCEED TO ANSWER THE RELATED QUESTIONS REGARDING DAMAGES
BEGINNING ON PAGE 11. IF YOU DO NOT FIND THAT AT LEAST ONE DEFENDANT IS
LIABLE AS TO ANY PLAINTIFF, YOU SHOULD PROCEED NO FURTHER.

DRAFT as of 2/12/15UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
ELISE GOULD, RONALD GOULD, SHAYNA :
GOULD, JESSICA RINE, HENNA NOVACK :
WALDMAN, MORRIS WALDMAN, SHMUEL :
WALDMAN, :

Plaintiffs,

v.

THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE PALESTINIAN :
AUTHORITY (PA), :

-----Defendants-----

X

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES**I. JANUARY 22, 2002 – JAFFA ROAD SHOOTING**

1. ~~What amount of damages, if any, do you award as compensation for~~ Plaintiff **Elise Gould**, what amount of damages, if any, do you find were caused by ~~his~~ **injuries that you determine were caused by the January 22, 2002 terrorist** attack?

\$

2. What amount of damages, if any, do you award as compensation for Plaintiff **Ronald Gould's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

3. What amount of damages, if any, do you award as compensation for Plaintiff **Shayna Gould's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

4. What amount of damages, if any, do you award as compensation for Plaintiff **Jessica Rine's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

Comment [LF1]: Defendants propose same formulation throughout the Damages portion of the form.

DRAFT as of 2/12/15

5. What amount of damages, if any, do you award as compensation for Plaintiff **Henna Novack Waldman's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

6. What amount of damages, if any, do you award as compensation for Plaintiff **Morris Waldman's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

7. What amount of damages, if any, do you award as compensation for Plaintiff **Shmuel Waldman's** injuries that you determine were caused by the **January 22, 2002 terrorist** attack?

\$

DRAFT as of 2/12/15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x
:
ELANA SOKOLOW, JAMIE SOKOLOW, :
LAUREN SOKOLOW, MARK SOKOLOW, :
RENA SOKOLOW, :

Plaintiffs, :

v. :

THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE :
PALESTINIAN AUTHORITY (PA), :

----- Defendants ----- :
x

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES

II. JANUARY 27, 2002 – JAFFA ROAD BOMBING

1. What amount of damages, if any, do you award as compensation for Plaintiff **Elana Sokolow's** injuries that you determine were caused by the **January 27, 2002 terrorist** attack?

\$

2. What amount of damages, if any, do you award as compensation for Plaintiff **Jamie Sokolow's** injuries that you determine were caused by the **January 27, 2002 terrorist** attack?

\$

3. What amount of damages, if any, do you award as compensation for Plaintiff **Lauren Sokolow's** injuries that you determine were caused by the **January 27, 2002 terrorist** attack?

\$

4. What amount of damages, if any, do you award as compensation for Plaintiff **Mark Sokolow's** injuries that you determine were caused by the **January 27, 2002 terrorist** attack?

\$

DRAFT as of 2/12/15

5. What amount of damages, if any, do you award as compensation for Plaintiff **Rena Sokolow's** injuries that you determine were caused by the **January 27, 2002** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
: ALAN BAUER, BINYAMIN
BAUER, DANIEL : BAUER,
YEHO NATHON BAUER, YEHUDA :
BAUER, :
:
Plaintiffs, :
:
v. :
:
THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE :
PALESTINIAN AUTHORITY (PA), :
:
----- Defendants ----- :
X

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES

III. MARCH 21, 2002 – KING GEORGE STREET BOMBING

1. What amount of damages, if any, do you award as compensation for Plaintiff **Alan Bauer's** injuries that you determine were caused by the **March 21, 2002 terrorist** attack?

\$

2. What amount of damages, if any, do you award as compensation for Plaintiff **Binyamin Bauer's** injuries that you determine were caused by the **March 21, 2002 terrorist** attack?

\$

3. What amount of damages, if any, do you award as compensation for Plaintiff **Daniel Bauer's** injuries that you determine were caused by the **March 21, 2002 terrorist** attack?

\$

4. What amount of damages, if any, do you award as compensation for Plaintiff **Yehonathon Bauer's** injuries that you determine were caused by the **March 21, 2002 terrorist** attack?

\$

DRAFT as of 2/12/15

5. What amount of damages, if any, do you award as compensation for Plaintiff **Yehuda Bauer's** injuries that you determine were caused by the **March 21, 2002** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
LEONARD MANDELKORN, :
 :
 :
 Plaintiff, :
 :
 v. :
 :
 THE PALESTINE LIBERATION :
 ORGANIZATION (PLO) and THE :
 PALESTINIAN AUTHORITY (PA), :
 :
 Defendants. :
 :
 ----- X

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES

IV. JUNE 19, 2002 – FRENCH HILL BOMBING

1. What amount of damages, if any, do you award as compensation for Plaintiff
Leonard Mandelkorn's injuries that you determine were caused by the **June 19,**
2002 ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
:
KATHERINE BAKER, ESTATE OF BENJAMIN :
BLUTSTEIN, REBEKAH BLUTSTEIN, RICHARD :
BLUTSTEIN, ESTATE OF DIANE CARTER, LARRY :
CARTER, SHAUN CHOFFEL, ROBERT L. :
COULTER JR., DIANE COULTER MILLER, :
ROBERT L. COULTER SR., ESTATE OF JANIS :
RUTH COULTER, ESTATE OF DAVID GRITZ, :
NEVENKA GRITZ (on behalf of herself and as :
successor to NORMAN GRITZ), :

Plaintiffs,

v.

THE PALESTINE LIBERATION ORGANIZATION :
(PLO) and THE PALESTINIAN AUTHORITY (PA), :

Defendants.

-----X

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES

V. JULY 31, 2002 – HEBREW UNIVERSITY BOMBING

1. What amount of damages, if any, do you award as compensation for Plaintiff
Katherine Baker's injuries that you determine were caused by the **July 31,**
2002 terrorist attack?

\$

2. What amount of damages, if any, do you award as compensation for Plaintiff
Benjamin Blutstein's injuries that you determine were caused by the **July 31, 2002**
terrorist attack?

\$

3. What amount of damages, if any, do you award as compensation for Plaintiff
Rebekah Blutstein's injuries that you determine were caused by the **July 31,**
2002 terrorist attack?

\$

DRAFT as of 2/12/15

4. What amount of damages, if any, do you award as compensation for Plaintiff **Richard Blutstein's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

5. What amount of damages, if any, do you award as compensation for Plaintiff **Diane Carter's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

6. What amount of damages, if any, do you award as compensation for Plaintiff **Larry Carter's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

7. What amount of damages, if any, do you award as compensation for Plaintiff **Shaun Choffel's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

8. What amount of damages, if any, do you award as compensation for Plaintiff **Robert L. Coulter Jr.'s** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

9. What amount of damages, if any, do you award as compensation for Plaintiff **Diane Coulter Miller's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

10. What amount of damages, if any, do you award as compensation for Plaintiff **Robert L. Coulter Sr.'s** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

11. What amount of damages, if any, do you award as compensation for Plaintiff **Janis Ruth Coulter's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

12. What amount of damages, if any, do you award as compensation for Plaintiff **David Gritz's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

13. What amount of damages, if any, do you award as compensation for Plaintiff **Nevenka Gritz's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

14. What amount of damages, if any, do you award to Plaintiff **Nevenka Gritz as successor to Norman Gritz** as compensation for Plaintiff **Norman Gritz's** injuries that you determine were caused by the **July 31, 2002** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
CHANA GOLDBERG, ELIEZER GOLDBERG, :
ESTHER GOLDBERG, KAREN GOLDBERG, :
SHOSHANA GOLDBERG, TZVI GOLDBERG, :
YAAKOV GOLDBERG, YITZHAK GOLDBERG, :
:
:
Plaintiffs, :
:
v. :
:
THE PALESTINE LIBERATION :
ORGANIZATION (PLO) and THE PALESTINIAN :
AUTHORITY (PA), :
:
:
----- Defendants. -----
X

Jury Verdict Form

04 Civ. 00397 (GBD)

DAMAGES

VI. JANUARY 29, 2004 – BUS NO. 19 BOMBING

1. What amount of damages, if any, do you award as compensation for Plaintiff **Chana Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

2. What amount of damages, if any, do you award as compensation for Plaintiff **Eliezer Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

3. What amount of damages, if any, do you award as compensation for Plaintiff **Esther Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

4. What amount of damages, if any, do you award as compensation for Plaintiff **Karen Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

5. What amount of damages, if any, do you award as compensation for Plaintiff **Shoshana Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

6. What amount of damages, if any, do you award as compensation for Plaintiff **Tzvi Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

7. What amount of damages, if any, do you award as compensation for Plaintiff **Yaakov Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

8. What amount of damages, if any, do you award as compensation for Plaintiff **Yitzhak Goldberg's** injuries that you determine were caused by the **January 29, 2004** ~~terrorist~~ attack?

\$

DRAFT as of 2/12/15

Dated: This _____ day of February, 2015

Signature of Foreperson